

Message

From: Beslow, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B5DD587C0E294AC3898958FEF9062D03-MBESLOW]
Sent: 5/17/2017 7:08:52 PM
To: Arnold, Paul S LT [Paul.S.Arnold2@uscg.mil]
CC: Fitzgerald, Sean F MST1 [Sean.F.Fitzgerald@uscg.mil]
Subject: RE: oil sampling plan
Attachments: 1406-009_ECI Site_Abbreviated SAP_Final.pdf; DRAFT Kokomo VOC Plume Site- RS SAP - Third Round ver3.pdf

Hey LT-

Find the attached examples of sampling plans - two of them are done by EPA contractors, the third was done by an RP. Two of them are not oil, but they are soil sampling. ECI is an oil site down the Indiana Harbor Canal in east Chicago.

-----Original Message-----

From: Arnold, Paul S LT [mailto:Paul.S.Arnold2@uscg.mil]
Sent: Wednesday, May 17, 2017 10:31 AM
To: Beslow, Mike <beslow.mike@epa.gov>
Cc: Fitzgerald, Sean F MST1 <Sean.F.Fitzgerald@uscg.mil>
Subject: oil sampling plan

Good Morning Mike,

Thanks a lot for talking with us. Please send us an example oil sampling plan as we discussed. Below are some of the questions our unit came up with:

1. They mention that they will study ArcelorMittal Intake No. 2 (last bullet in 1.0 Section) but they don't mention any sampling at this location in the report. We want them to identify where their heavy fuel oil tanks were located previously (40-50 years ago) and collect adequate number of soil samples (deep enough - likely deeper than 6 inches) in and adjacent to their water intake. Right now, they have no evidence to rule out the fact that these tanks leaked fuel into the sediment and that fuel is now leaching into their water intake. Until they can prove that it is NOT by means of quantitative sampling, they have to still consider it a possible source (especially given the fact that our sampling indicates heavy fuel oil is present and none of their production raw materials contains heavy fuel oils).
2. They need to use an accredited laboratory for sample analysis. I'm sure they will but they need to let us know which lab they intend to use and that they are accredited to analyze EPA Methods.
3. They do mention the company they will be hiring to execute this study but they do not describe their qualifications, credentials, etc. That is, are they qualified to do this type of work?
4. I think they may want to consider taking soil samples deeper than 6 inches (but a different sampling method may be required for validity). We need an experienced OSC w/EPA to validate that 6 inch subsurface sampling is sufficient and that deeper soil samples are not warranted.
5. A deadline when sampling will be performed and when to expect a report of findings needs to be provided.
6. I would also like to know why the monitoring wells by their intake were installed? Did EPA mandate them or did they do it for some reason? This should be discussed in the report and any data for these wells obtained and presented. Can EPA assist with this issue?

Very respectfully,
LT Paul Arnold